

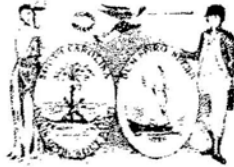
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State Budget and Control Board

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To: Kevin J. Martin, Chairman  
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Robert M McDowell, Commissioner

Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington D. C. 20554

RE: Universal Service Reform - WC Docket No. 05-337

Dear Chairman and Commissioners:

I am a lawyer and the State E9-1-1 Project Manager in South Carolina, which included the primary drafting of amendments to South Carolina and implementation and administration of the state wireless 911 surcharge and E9-1-1 program. I am also an example and personally biased, as I live, often alone, in the woods on Lake Wateree in rural Fairfield county, 20 miles from any medical facility or ambulance, with no neighbors within half a mile, inadequate to no wireless service, and much use for a chain saw.

Personally and as a servant of South Carolina 911, I oppose the FCC placing a cap on the use of the Universal Service Fund (USF) for wireless service. Although such a cap may help eliminate the growth of this fund, it would also result in a number of disservices to rural consumers. Rural consumers want and need expanded and improved wireless services in rural areas for public safety, economic development, business and personal needs that are equally important to them as they are to urban consumers. This is one of the main benefits that rural consumers receive from the universal service fund, just as Congress envisioned when it initially established the fund. Rural Americans deserve the same access to telecom services that are available in the rest of the country—which is the bottom line purpose of the USF? Furthermore, such a wireless only cap is anti-competitive because it favors wireline services over the wireless services consumers are choosing more and more over landlines for economic and other benefits.

Consumers are clearly demanding access to the benefits of mobility that only wireless service provides. This mobility results in extremely important public safety benefits in rural areas. As rural

consumers travel from home to work or school, wireless service provides a very valuable safety tool. Additionally, wireless service in rural areas provides consumers with access to broadband services where broadband services are not otherwise available. This is a very important factor as we seek to bring access to the information age throughout our very rural state. Without continued support for the expansion and upgrading of the rural wireless networks, consumers will not receive these benefits where they do not already exist. Universal service support is essential if rural consumers are to be provided services and rates comparable to those available in urban areas.

I have witnessed firsthand the benefits provided by expanded wireless services in rural South Carolina, and I do not want to see those benefits diminished by inappropriate USF reform. I believe much of the expanded availability of wireless service in rural areas would not have occurred without the USF support provided to wireless ETCs who could not have economically extended their networks without such support.

Please consider what limiting the growth of wireless access will mean for rural America. Wireless technology plays an ever-increasing role in economic growth and is a critical instrument in emergency situations, but if the recommended cap is implemented, many communities may never realize these benefits. In a country that prides itself on equality, it seems hypocritical to restrict certain individuals' access to an essential tool simply because of their geographic location, especially when they have contributed for years to the USF along with everyone else.

The FCC's rule making has always impressed and satisfied me, to the extent I've understood the complex, rapidly evolving, even revolutionary, issues with which it deals. Consequently I am confident it will consider these facts as it reforms the existing fund, and find competitively neutral proposals to slow fund growth, ensure accountability for how these funds are used and promote the continued expansion and improvement of these much needed services in rural areas by targeting funds to high cost areas rather than by targeting cost reductions at wireless providers. However, FCC rulemaking includes the views of the consumers and public safety communications professionals, so I urge you to vote against the proposed cap on universal service support for wireless service.

Sincerely,

*James W. Rion*

SC State E9-1-1 Project Manager